

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BOMBARDIER INC.,

Plaintiff,

v.

MITSUBISHI AIRCRAFT
CORPORATION, MITSUBISHI
AIRCRAFT CORPORATION AMERICA,
INC., et al.,

Defendants.

2:18-cv-1543 RAJ

DECLARATION OF DAVID RILEY IN
SUPPORT OF DEFENDANT MITSUBISHI
AIRCRAFT CORPORATION AMERICA,
INC.'S RESPONSE TO MOTION FOR
PRELIMINARY INJUNCTION

I, David Riley, declare as follows:

1. I am the Information Technology Manager for United States infrastructure for Mitsubishi Aircraft Corporation America, Inc. ("MITAC America"). I am over the age of eighteen and competent to be a witness. Unless otherwise specified, I make this declaration based on personal knowledge and/or a review of MITAC America business records.
2. MITAC America operates a total of three network-based file share servers. The host names for these 3 servers are: (1) ysmtafs01, (2) ysmtafs02, and (3) ysmtafs03.
3. MITAC America will assign a MITAC America laptop computer, and on some occasions, a MITAC America iPhone to certain Aerospace Testing Engineering & Certification

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DEFENDANT MITAC AMERICA'S RESPONSE TO MOTION
FOR PRELIMINARY INJUNCTION (NO. 18-CV-1543 RAJ) – 1

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1 Inc. ("AeroTEC") employees depending on their role in assisting with the development of the
2
3 Mitsubishi Regional Jet ("MRJ") aircraft.

4
5 4. MITAC America creates and maintains a record for each device that is assigned
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7 to an employee, whether a MITAC America employee or an AeroTEC employee, and these
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9 records contain the normal identifiers including model number, part number, serial number and
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11 host name and the associated employee's ID and work location.

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13 5. I have reviewed the MITAC America records described above and identified that
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15 the only such devices assigned by MITAC America to the individuals named as defendants in
16
17 this lawsuit are as follows:

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19 a. Cindy Dorneval, an AeroTEC employee, has been assigned by MITAC America
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21 for her use a total of two MITAC America laptops (first YSMTA0217 and
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23 thereafter YMMTA0017), and no iPhone;
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25 b. Laurus Basson, an AeroTEC employee, has been assigned by MITAC America
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27 for his use a total of two MITAC America laptops (first YSMTA0181 and
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29 thereafter YSMTA0005), and no iPhone.
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31 c. Michel Korwin-Szymanowski and Keith Ayers have never been assigned a
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33 MITAC America laptop or iPhone.
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35 d. While an AeroTEC employee, Marc-Antoine Delarche ("Delarche") was assigned
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37 by MITAC America for his use a total of two laptops (YSMTA0263 and
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39 thereafter loaner YSMTA0004), and no iPhone. (Loaner laptop YSMTA0004 was
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41 loaned to and used by Delarche temporarily. Upon its return to MITAC America,
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43 it was reimaged and redeployed to another employee.)
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6. MITAC America provided to Fronteo, USA Inc. ("Fronteo"), for imaging by the Fronteo team, the laptops identified as: YSMTA0017, YSMTA0181, YSMTA0263, YSMTA0005, YSMTA0217.

7. Fronteo was also provided access to a Seagate Hard Disk Drive labeled "EXT Hard Drive 1," which I am informed and understand contains a back-up of MITAC America's ysmtafs02 server data that was made in March 2018 by an employee of MITAC America.

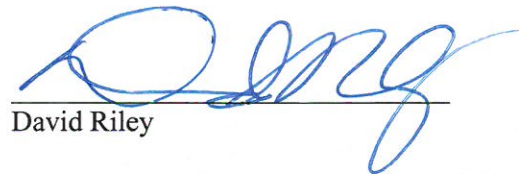
8. Fronteo was provided access to MITAC America's server cage at 6100 4th Ave South, Suite 300, Seattle, WA 98108, NetApp storage appliance sharing "YSMTAFS01," "YSMTAFS02" and "YSMTAFS03." This access includes all areas of the file share servers accessible to employees of MITAC America.

9. Fronteo was provided a hard drive (WD My Passport, S/N WXF1E38H2X12), for imaging by the Fronteo team, which is a back-up of server ysmtafs01 that I made on November 19-22, 2018.

10. Fronteo was provided a hard drive (WD My Book, S/N WCC7KOYAR9RA) for imaging by the Fronteo team, which is a back-up of server ysmtafs02 that I made on November 26, 2018.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 21st day of December 2018.


David Riley

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CERTIFICATE OF SERVICE

I certify under penalty of perjury that on December 27, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses indicated on the Court's Electronic Mail Notice List.

DATED this 27th day of December 2018.

/s/ Jerry A. Riedinger

Jerry A. Riedinger, WSBA No. 25828

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